

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN BRADLEY,

Plaintiff,

v.

TIMOTHY J. CRUZ (Individually),
MICHAEL HORAN (Individually),
FRANK J. MIDDLETON (Individually),
AND OFFICE OF THE DISTRICT
ATTORNEY FOR PLYMOUTH
COUNTY,

Defendants.

Civil Action No. 1:13-cv-12927-IT

AFFIDAVIT OF RICHARD LINEHAN

1. My name is Richard Linehan. I am an Assistant District Attorney ("ADA") with the Plymouth County District Attorney's Office ("the Office").
2. I am making this affidavit based on my personal knowledge.
3. I am a resident of Hingham, Massachusetts.
4. I have worked for the Office since March 24, 2003.
5. Prior to working for the Office, I worked as a criminal defense lawyer from 1987-2000.
6. I understand my assigned location during D.A. Cruz's 2010 election year has become an issue in Mr. Bradley's lawsuit.
7. In March of 2010, I was working at the Office as an Assistant District Attorney ("ADA") working as a district court prosecutor in Wareham District Court.
8. In March 2010, in a discussion about the 2010 State Championship for the Hingham Harbormen (a team my son was a part of), Chief Legal Counsel Horan told me he was going to get me to Hingham District Court ("HDC"). I saw this as convenient because then (as is I do now), I lived in Hingham.
9. By May of 2010, I was transferred to HDC.
10. In July of 2010, I was named Supervisor of HDC.
11. I remained in HDC until 2011, when I was promoted to a Superior Court Prosecutor.
12. At no point during my employment at the Office, including the time surrounding D.A. Cruz's November 2010 election, have I felt pressure to contribute (monetarily or otherwise) to D.A. Cruz's campaigns.

Signed under the pains and penalties of perjury, this 13th day of June, 2016


Richard Linehan